EGULATORY GUIDE

OFFICE OF STANDARDS DEVELOPMENT

REGULATORY GUIDE 7.7

ADMINISTRATIVE GUIDE FOR VERIFYING COMPLIANCE WITH PACKAGING REQUIREMENTS FOR SHIPMENTS OF RADIOACTIVE MATERIALS

A. INTRODUCTION

The Commission's regulation, 10 CFR Part 71, "Packaging of Radioactive Material for Transport and Transportation of Radioactive Material Under Certain Conditions," applies to licensees of the Commission who transport licensed material or who deliver licensed material to a carrier for transport. In their transport or delivery of packages of radioactive material, licensees who are not otherwise subject to Department of Transportation (DOT) regulations may be required by §71.5, "Transportation of Licensed Material," of 10 CFR Part 71, to conform to certain standards and requirements of the DOT. This regulatory guide describes a method acceptable to the NRC staff for licensees to verify their compliance with the requirements of §71.5. Where the use of Type B and fissile material packages are required, however, the shipper must also refer, as appropriate, to the specific provisions of the package approval, to Subpart D, "Operating Procedures," of LCFR Part 71, and to 10 CFR Part 73, "Physical Procedure of Plants and Materials," for requirements that may not be adequately provided for in this guide. This guide does not preclude the use of other effective means for verifying and documenting compliance with applicable requirements. plicable requirements

DECUSSION

Subcomputee N14.10 on Administration of the Regulations of the American National Standards Institute (ANSI) has developed:

1. A method whereby compliance with packaging requirements may be verified and documented:

- 2. Guidance to be followed in the event of incidents that threaten package integrity; and
- 3. A plan for receivers to verify the integrity of delivered packages.

ANSI Std N14.10.3-1975, "Administrative Guide for Verifying Compliance with Packeting Requirements for Shipments of Radioactive Materials,"* sets forth techniques that have been successfully used and proved in practice as illustrations of acceptable methodology. These techniques include the use of information sheets and checklists. The standard was approved by NSI on March 19, 1975.

C REGULATORY POSITION

The guidance contained in ANSI N14.10.3-1975 is enerally acceptable to the NRC staff for use by Commission licensees in verifying compliance with the requirements of DOT regulations as they are imposed by the provisions of §71.5 of 10 CFR Part 71. Where the use of Type B and fissile material packages are required, the provisions (1) of the package approval, (2) of Subpart D of 10 CFR Part 71, and (3) of 10 CFR Part 73 should be additionally considered.

D. IMPLEMENTATION

This regulatory guide may be used upon issuance by any person who is a shipper of packages of radioactive material to assist him in verifying his compliance with regulatory packaging requirements.

* Copies may be obtained from the American National Standards Institute, Inc., 1430 Broadway, New York, N.Y. 10018.

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